

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

FOUR WOMEN HEALTH SERVICES, LLC

Plaintiff,

v.

ABUNDANT HOPE PREGNANCY
RESOURCE CENTER INC. d/b/a ATTLEBORO
WOMEN'S HEALTH CENTER, CATHERINE
ROMAN, NICOLE CARGES, and DARLENE
HOWARD,

Defendants.

Civil Action No.: 1:24-cv-12283-JEK

PRE-CONFERENCE STATUS REPORT

In anticipation of the December 12, 2024 video status conference set by this Court on December 10, 2024, *see* ECF 45, Plaintiff Four Women Health Services, LLC (“Four Women”) provides the following Status Report regarding activity in this case.

1. On December 6, 2024, the parties filed a Joint Status Report explaining Four Women’s intent to request leave to amend its complaint. ECF 43. The parties stated in the Joint Status Report that, on the same day, Four Women served a copy of its intended Motion for Leave to File Amended Complaint (the “Motion”) on Choose Life Marketing, LLC (“Choose Life Marketing”), a new defendant added to Four Women’s proposed amended complaint. *Id.* ¶ 5. A copy of the Motion package served on Choose Life Marketing is attached hereto as **Exhibit A**.

2. The parties' Joint Status Report further explained that, pursuant to Rule 15.1 of the Court's Local Rules, Four Women served its Motion on Choose Life Marketing 14 days before filing it with the Court. ECF 43 ¶ 5. Four Women thus intends to file its Motion on December 20, 2024.
3. On December 6, 2024, Four Women also served a courtesy copy of its intended Motion and accompanying papers, including its proposed amended complaint, on counsel for Defendants.
4. On December 9, 2024, counsel for Defendants contacted counsel for Four Women to inform Four Women it intended to file a summary judgment motion in spite of Four Women's Motion. Counsel for Defendants then served by email a proposed motion to seal its summary judgment motion. In response, counsel for Four Women asked a clarifying question about Defendants' proposed motion to seal and urged counsel for Defendants to refrain from filing their intended summary judgment motion, as such a motion would become moot when the complaint is amended.
5. As of the date of this filing, Four Women understands that Defendants intend to proceed with their motion for summary judgment notwithstanding the mootness issue that Four Women raised with counsel for Defendants.

DATED: December 11, 2024

Four Women Health Services, LLC,

By its attorneys,

/s/ Matthew Patton

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CERTIFICATE OF SERVICE

On December 11, 2024, I, Emily Nash, caused to be served the within on counsel for Defendants via ECF service.

/s/ *Emily Nash*
Emily Nash